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Speech-to-Speech is not a new concept to me. I was on the Deaf and Disabled Telecommunications Advisory Committee of the California Public Utilities Commission when they approved STS trials in the mid nineties. I have two concerns:

1. Essentially Speech-to-Speech has failed. CA services are generally poor and usage is minimal. Users do not have the resources to correct those problems. STS can be made to succeed by changes in FCC policy. The FCC must recognize that America's subpopulation of people with speech disabilities does not have the power to successfully advocate for such change. The FCC must take "in loco parentis" responsibility to ensure that:
  - A. A large percentage of people with speech disabilities are identified and taught to use STS.
  - B. CAs are trained and motivated to provide good service.

Both A and B can happen if STS providers have the financial incentive to pursue those goals.

The problem all along is that we have assumed that STS could work within the parameters of the TTY relay model. This is a misconception. Deaf people constitute a community that can be organized, while people with speech disabilities do not have the structure of social cohesion necessary to form a viable community. They are made up of many unrelated groups such as people with cerebral palsy, ALS, Parkinson's and MS, etc. Each group has its own organization and these organizations generally do not communicate on speech disability related issues. While Speech Communications Assistance by Telephone attempts to unite these groups around STS issues, SCT does not have the resources to address the issues comprehensively. While deaf people can communicate by sign language, people with speech disabilities in general do not understand each other's speech and rely on revoicers to communicate with each other. When the FCC approved STS it was under the false assumption that people with speech disabilities could rely on a community to help them coalesce around STS issues.

I urge the FCC to take appropriate measures to see that STS succeeds.

2. STS-IP will fail as proposed because a large percentage of potential users cannot afford the computers and related equipment necessary to use STS-IP. Poverty is

very common among this generally unemployed population. If STS-IP is to be approve, the FCC must first determine that there are societal mechanisms to provide this equipment.